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Attorney for Defendant  
DAVID HANSEN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

DAVID KENNETH HANSEN,  
Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE  
AND EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT

Date: April 28, 2022  
Time: 9:30 a.m.  
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on April 28, 2022. By this stipulation, Defendant Hansen moves to continue the status conference to June 9, 2022.
2. This case involves drug trafficking and firearm charges stemming from execution of ORDER CONTINUING STATUS CONFERENCE

1 search warrants in Sacramento and Placer Counties.

- 2 3. The government has provided defense counsel with discovery consisting of written  
3 offense reports and audio recordings. Defense counsel previously requested the  
4 government produce supplemental discovery materials. The defense has also shared  
5 with the government defense investigation materials as the basis for facilitating  
6 settlement discussions. The government is presently downloading some of the items  
7 requested by the defense as supplemental investigation onto an external hard drive.  
8 The defense recently provided the external hard drive to the government to facilitate  
9 the downloading of the requested supplemental discovery. These items require a  
10 large amount of computer storage space - estimated to be more than two terabytes.  
11 Discovery of this material is anticipated to occur within approximately the next week.  
12 4. The defense is continuing with its own investigation in this matter while settlement  
13 discussions proceed between the parties. Defense counsel requires time to conduct  
14 this investigation and anticipates that follow up defense investigation will be required  
15 based on production of the supplemental discovery materials downloaded on the  
16 external hard drive. Additional time will also be needed to review the supplemental  
17 discovery materials and any defense investigation results with Mr. Hansen.  
18 5. Some of the relevant events in this case occurred near Auburn, California,  
19 approximately 35 miles northeast of downtown Sacramento. The defense therefore  
20 requests additional time to perform its investigation in the Auburn area.  
21 6. Given the ongoing defense investigation, Defendant Hansen requests to continue the  
22 status conference in this matter to June 9, 2022, at 9:30 a.m., and to exclude time  
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ORDER CONTINUING STATUS  
CONFERENCE

1 between April 28, 2022, and June 9, 2022, inclusive, under Local Code T-4. The  
2 United States does not oppose this request.

3 7. Attorney Todd Leras represents and believes that failure to grant additional time as  
4 requested would deny Defendant Hansen the reasonable time necessary for effective  
5 preparation, considering the exercise of due diligence.

6  
7 8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*  
8 *seq.*, within which trial must commence, the time period of April 28, 2022 to June 9,  
9 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B)  
10 (iv) [Local Code T-4] because it results from a continuance granted by the Court at  
11 Defendant Hansen's request on the basis that the ends of justice served by taking such  
12 action outweigh the best interest of the public and the Defendant in a speedy trial.

13  
14 9. Nothing in this stipulation and order shall preclude a finding that other provisions of  
15 the Speedy Trial Act dictate that additional time periods are excludable from the  
16 period within which a trial must commence.

17  
18 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized  
19 Todd Leras via email to sign it on his behalf.

20 DATED: April 26, 2022

PHILLIP A. TALBERT  
United States Attorney

21  
22 By /s/ Todd D. Leras for  
JAMES CONOLLY  
Assistant United States Attorney

23  
24 DATED: April 26, 2022

25 By /s/ Todd D. Leras  
TODD D. LERAS  
Attorney for Defendant  
DAVID HANSEN

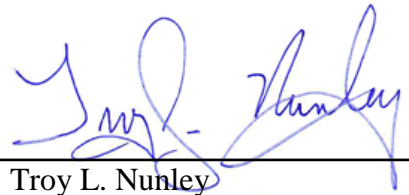
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28 ORDER CONTINUING STATUS  
CONFERENCE

**ORDER**

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for April 28, 2022, is vacated. A new status conference is scheduled for June 9, 2022, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from April 28, 2022, up to and including June 9, 2022.

IT IS SO ORDERED.

DATED: April 26, 2022

  
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Troy L. Nunley  
United States District Judge

ORDER CONTINUING STATUS  
CONFERENCE